

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

1) ISAAC E. HEAVEN,
2) ROGER L. MARTIN,

Plaintiffs,

v.

Case No. CIV-15-823-R

1) SKINNER TANK COMPANY, an
Oklahoma Corporation,

Defendant.

ATTORNEYS' LIEN CLAIMED JURY TRIAL DEMANDED

COMPLAINT

COME NOW Plaintiffs, Isaac E. Heaven and Roger L. Martin, and, for this their claim and cause of action against the Defendant, Skinner Tank Company, state as follows:

1. This Court has jurisdiction of the parties and the subject matter of this action by virtue of 42 U.S.C. § 1981, as amended. 28 U.S.C. § 1331.

2. At all times material hereto, Plaintiffs, and each of them, have been Black employees of the Defendant.

3. Throughout their employment, individually and collectively, Plaintiffs have been subject to discrimination based on their race and have endured a racially hostile work environment, as a result of Defendant's negligent or reckless or willful acts and omissions. Ultimately, Plaintiffs were terminated based on their race.

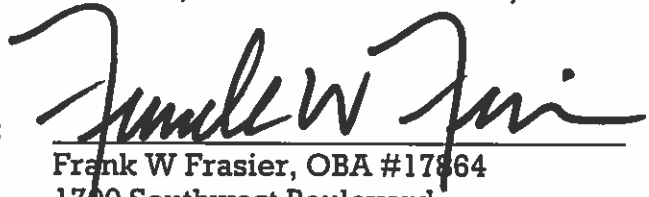
4. As a result, Plaintiffs have lost wages, endured emotional distress, and have been otherwise damaged.

WHEREFORE, premises considered, Plaintiffs, and each of them, do pray for judgment against the Defendant for actual and punitive damages in the sum of \$1,000,000, attorney fees and expert fees, all costs of this action, injunctive relief and such other relief to which they may be deemed entitled.

Respectfully submitted,

FRASIER, FRASIER & HICKMAN, LLP

By:

A handwritten signature in black ink, appearing to read "Frank W. Frasier", written over a horizontal line.

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